

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:
VENTECH ENGINEERS LP et al.,

Debtors,

**RODNEY D. TOW, CHAPTER 7
TRUSTEE FOR THE ESTATES OF
VENTECH ENGINEERS
INTERNATIONAL LLC & VENTECH
ENGINEERS, LP,**

Plaintiffs,

V.

**FIVE STAR PROPERTIES
BROADWAY LLC, VELOCYS, INC.,
KREG STANLEY, KEVIN STANLEY,
BILL STANLEY, JOHNNY VIRGIN,
IAN ANDERSON & DOES 1-10,**

Defendants.

JOINT STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT

Plaintiff Rodney D. Tow, Chapter 7 Trustee for the Estates of Ventech Engineers International LLC & Ventech Engineers, LP (“Plaintiff”) and Defendants Five Star Properties Broadway LLC, Velocys, Inc., Kreg Stanley, Kevin Stanley, Bill Stanley, and Ian Anderson (collectively, Defendants”)¹ file this Joint Stipulation to Extend Time to Respond to Plaintiff’s Complaint (D.E. 1) (the “Complaint”) and respectfully show the Court the following:

¹ Defendants Johnny Virgin and Does 1-10 are not parties to this Stipulation.

1. The current deadlines for Defendants to respond to the Complaint range from May 2-4, 2020.
2. Plaintiff and Defendants have agreed to an extension for Defendants to answer, move, or otherwise respond to the Complaint on or before June 2, 2020.
3. Plaintiff and Defendants do not request this extension for purposes of delay, but so that justice may be done.

PRAYER

For the reasons set forth above, Plaintiff and Defendants respectfully request the Court enter an order reflecting the Parties' stipulation, as well as all additional relief which the Court deems appropriate.

Date: May 4, 2020

Respectfully submitted,

/s/ Charles Rubio

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was electronically filed with the Court and served through the CM-ECF system to all counsel of record registered to receive a Notice of Electronic Filing for this case on the 4th day of May, 2020.

By: /s/ Mitchell Murphy
Mitchell Murphy